

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

LEXINGTON INSURANCE COMPANY and
NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH,

Plaintiffs,

v.

VIRGINIA SURETY COMPANY, INC.

Defendant.

CIVIL ACTION NO. 04-11109 RGS

**JOINT MOTION TO EXTEND THE TIME FOR FILING
DISPOSITIVE MOTIONS BY TWO WEEKS**

Defendant Virginia Surety Company, Inc. (“VSC”) and Plaintiffs Lexington Insurance Company (“Lexington”) and National Union Fire Insurance Company of Pittsburgh, PA (“NUFIC”) (collectively, the “Parties”) respectfully request that the Court extend the deadline for filing dispositive motions by two weeks, from April 17, 2006 to May 1, 2006. All parties join in this motion in order to permit the Plaintiffs to oppose, and the Court to rule on, VSC’s pending Motion for Reconsideration (filed April 5, 2006) before the parties are required to file summary judgment motions, and to accommodate the schedules of the parties and lawyers involved in preparing the motions.

WHEREFORE, the Parties jointly request that this Court extend the deadline for filing dispositive motions to May 1, 2006.

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LEXINGTON INSURANCE COMPANY
AND NATIONAL UNION FIRE
INSURANCE COMPANY OF
PITTSBURGH, PA,

By their attorneys,

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Dated: 4/6/05

VIRGINIA SURETY COMPANY, INC.

By its attorneys,

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Dated: 4/6/05

Certificate of Service

I, Nicholas C. Cramb, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on April 6, 2006.

/s/ Nicholas C. Cramb

Dated: April 6, 2006